

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND

2014 JUN -6 PM 3:16 THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

2014 MAR -7 PM 12:07

CLERK'S OFFICE
AT BALTIMORE

CLERK'S OFFICE
AT BALTIMORE

BY Tafadzwa Nhira DEPUTY

BY _____ DEPUTY

5314 Myers Orchard Way

Perry Hall, MD, 21128

(Full name and address of the plaintiff)

v.

Civil Action No. WMN-14-676
(Leave blank. To be filled in by Court.)

Thompson Hospitality, 505 Huntmar park Drive, Suite

Virginia, 20170. Compass Group, 2400 Yorkmont Rd

Charlotte NC 28217, Morgan State University, Bowie

State. Jenoure, Brown, Zaikouk, Mitchell, Burge, Kelly, Weidner, Zaghari, Amos, McGwire

(Full name and address of the defendant(s))

Amended complaint TN

COMPLAINT FOR EMPLOYMENT DISCRIMINATION

1. Plaintiff is a resident of Tafadzwa Nhira
(Fill in county or city and state of residence)
2. Defendant(s) reside(s) or does business at the following location: Morgan State University

1700 East Cold spring Lane, Baltimore, MD 21251, Bowie State University Bowie, MD

3. This action is brought pursuant to (check all spaces that apply):
 - ☒ Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. §§ 2000e, *et seq.*, for employment discrimination on the basis of race, color, religion, sex, or national origin.
 - ☐ Age Discrimination in Employment Act of 1967, as amended, 29 U.S.C. §§ 621, *et seq.*, for employment discrimination on the basis of age. My year of birth is: _____

☐ Rehabilitation Act of 1973, as amended, 29 U.S.C. §§ 701, *et seq.*, for employment discrimination on the basis of a disability by an employer which constitutes a program or activity receiving federal financial assistance.

☐ Americans with Disabilities Act of 1990, as amended, 42 U.S.C. §§ 12101, *et seq.*, for employment discrimination on the basis of disability.

4. I am complaining about (check all that apply):

☐ Failure to hire me. I was refused a job on the following date: _____

☒ Termination of my employment. I was terminated from my employment on the following date: December 6th, 2011

☐ Failure to promote me. I was refused a promotion on the following date: _____

☒ Other (explain what happened): Violation of public trust a
Engagement in protected activity including violation of Sarbanes-Oxley
Otherwise discrimination and as set forth in the statement of fact section

5. The conduct of Defendant(s) was discriminatory because it was based on (check all that apply):

☒ race ☒ color ☒ religion ☒ sex ☐ age ☒ national origin ☐ disability

6. The facts of my claim are: are as set forth in the factual complaint attached.

7. The approximate number of people employed by Defendant is: over 500 people

8. The events I am complaining about took place on the following dates or time period:

as set forth in the statement of facts.

9. I filed charges on the following date: September 20th of 2011 with:

☒ Equal Employment Opportunity Commission (EEOC)

☐ Maryland Human Relations Commission

☐ Other (give name of agency and location): _____

10. I received a right to sue letter (attach copy) on the following date: December 10th of 2

WHEREFORE, Plaintiff asks the Court to grant such relief as may be appropriate,
including but not limited to (check all that apply):

☒ Injunctive relief (specify what you want the Court to order): _____

As set forth the prayer for relief section

☒ Back pay.

☐ Reinstatement to my former position.

- ☒ Monetary damages in the amount of: as set forth in the relief section.
- ☒ Costs and attorneys fees.
- ☒ Other (specify): as set fort in the prayer for relief section

March 7th, 2014.
(Date)

J. N. Nwira
(Signature)

JAFADZWA NHIRA
5314 MYERS ORCHARD WAY
PERRY HALL MD,
21128, 443-653-1541.
(Printed name, address and phone number of
Plaintiff)

Honorable Judge,

I am amending the complaint by adding the following parties to the lawsuit.

Michael Amos

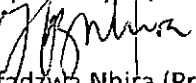
He did not count all the product that was in the account and he knew it was illegal and his inventory counts were false. His food inventory in exhibit 3 is false and he knew it. His statement in front of Burge and Wilkins on December 5th 2011 that we should reach a compromise by just writing \$23,000.00 of food inventory is further evidence of his knowledge of the falsity of the inventories he had turned in. I had specifically asked him of numerous products he left out and he knew it was a conspiracy to hurt me and I was hurt. I want him under oath to answer questions pertaining to his inventory he falsified which is illegal. He acted in cahoots with Burge and Mitchell to hurt me although he knew what they were doing, that is falsifying inventory, is against the law. Through their conspiracy of falsification of inventory, I was hurt.

Alessandria McGuire

She also acted in cahoots with Burge and Mitchell because after I asked her why they did not count all inventory she stated to me that there was too much product everywhere. The inventory they turned in was false and all product should have been counted to make sure the inventory was not misleading. She knew what they did was illegal and it was done to get rid of me. I want her under oath to answer questions pertaining to falsified inventory turned in. I was hurt by their conspiracy in furtherance of their real motive and I am seeking justice.

I sincerely appreciate your consideration of these additions.

Respectfully and humbly submitted,


Tafadzwa Nhira (Pro Se litigant)

FILED
U.S. DISTRICT COURT
DISTRICT OF MARYLAND
2014 JUN -6 PM 3:16
CLERK'S OFFICE
AT BALTIMORE
BY _____ DEPUTY